

# **EXHIBIT F**

**THE LAW OFFICES OF ROBERT G. ANDROSIGLIO, P.C.**

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**MILITARY SEXUAL TRAUMA MOVEMENT**  
**NOTICE TO CEASE AND DESIST**

**MILITARY**  
**SEXUAL**  
**TRAUMA**  
**Movement**

**NOTICE TO CEASE AND DESIST**

Deidra Hubay  
2399 Rosegarden Rd  
Pittsburgh, PA 15220

18 September 2019

Jessica Dorantes  
2677 Idlebrook Circle  
Midway Park, NC 28544

Alexis Gabrielle Herrick  
Address Unknown

**RE: LIBEL & UNLAWFULLY TAKING INTELLECTUAL PROPERTY OF MILITARY SEXUAL  
TRAUMA MOVEMENT (MSTM)**

Dear Mrs. Hubay, Mrs. Dorantes, and Ms. Herrick,

This letter is to serve as notice of your unlawful activity in your departure of volunteer leadership status in service to MSTM. Therefore, you are required to cease and desist all verbal and written statements targeted to discredit the movement, along with returning the intellectual property taken without authorization leading up to and upon your departure on 14th September 2019.

This is to include, but not limited to:

1. Several members of MSTM have reported that you placed phone calls to share with them that the protest led by myself, in front of the USMC Commandant's house on 14th September 2019 with the support of other Movement members, was not something that had been shared with the Senior Leadership Team. This was also shared publicly in a Facebook status on Ms. Hubay's public figure page, along with comments echoing her statements by Mrs. Dorantes and Ms. Herrick. Not only had this protest been discussed numerous times prior to its taking place, it was communicated that whoever wanted to go was welcome, and whoever



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wanted to stay back was welcome to do that as well. This is well documented and was witnessed by numerous other members of the Movement who participated in the Senior Leadership thread.

2. MSTM's contracted political consultant reported to me that she was contacted by your team after your departure urging her to terminate her contract. She added that you mentioned that you were concerned for my mental health, a claim that you never once brought to my attention. It is also a HIPAA violation to share with third parties of the MSTM movement statements regarding anyone's mental or physical health to make remarks regarding my medical well-being. It is imperative that you put a stop these discussion immediately.
3. All photos of your likeness were supplied and consented to be shared for official use. The photos taken of the Movement's activities in Washington, D.C. by Alex Losieniecki are property of the movement. All photos were taken on public property are deemed consensual as per District of Columbia law. Additionally, all photographed members gave consent prior to attending the movement's trip to DC and prior to resignation as official volunteers of MSTM. While Mr. Losieniecki is the spouse of Mrs. Hubay, he was also an official volunteer of MSTM and was operating in volunteer status when photographing Movement activities while in Washington, D.C., which is why MSTM provided lodging to Mr. Losieniecki. Further, Pamela Heal, Executive Director of Civic Engagement, witnessed Mr. Losieniecki hand me the memory card of all the photos he took for the movement. This is how the photos were delivered to my possession, and the Facebook comments Mr. Losieniecki and Mrs. Hubay made asserting that these photos were stolen or supplied void of consent are deliberately false statements of libelous nature which was intended to harm the movement. Any further falsehoods will be taken up through legal actions.
4. Upon your resignation from MSTM, it was discovered that a number of original, confidential documents and material were removed from MSTM's official drive. I have written documentation that any material saved inside of this online drive belongs to Military Sexual Trauma Movement, Inc. including the passwords of the emails attached to the drive's data. Not only was the password database missing to the emails used for official use only of MSTM, there are also missing documents written or supplied by other Movement members without authorization, and removed documents created in confidence for official use of MSTM exclusively. Further, it was discovered that many remaining documents were shared to the personal email of Mr. Losieniecki without Movement



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authorization and without sharing his email password in our directory, a direct violation of our fraternization policy that was created and a security violation to include an unauthorized movement volunteer beyond Movement authorization. Additionally, documents with Personally Identifiable Information (PII) signed by Pamela Heal and Kelsey Harbor were removed without consent or knowledge, though the documents were labeled with official MSTM letterhead for official purposes only: Ms. Herrick was given access to these confidential files for the sole use of placing official files on a terabyte file, which was explicitly agreed upon. It was also discovered that the confidential email password directory was removed from the drive and I requested access after it had been removed without my knowledge or consent. To date the restoration of access has not happened. This could have only been removed by one of the three individuals named in the letterhead.

5. The Intellectual property must be returned in its original entirety and all copies of MSTM related content must be removed from your possession, as it has been unlawfully acquired.
6. Several MSTM members have reported that you have shared a bevy of erroneous claims in an attempt to discredit the character of Movement leadership and the Movement's overall mission. This unlawful recruitment of our members will not be tolerated should these statements continue.

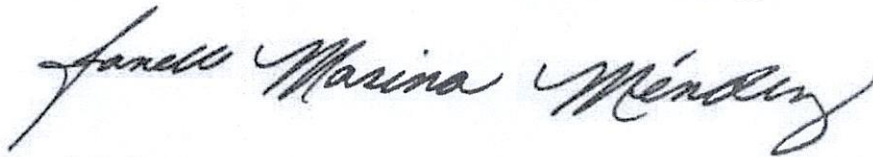
For the reasons mentioned above, it is clear that you have displayed your intention to cause harm towards Military Sexual Trauma Movement, Inc. and for these reasons it is imperative that you halt all harmful and unlawful activity in this mission.

**If you do not cease and desist from all libel and slander, and restore lawful possession of unlawfully acquired intellectual property immediately, a lawsuit and/or charges will be commenced upon you. This is your final and only warning.**

We continue to thank you for your service to survivors and victims of Military Sexual Trauma. We appreciate your efforts with the Military Sexual Trauma Movement, Inc. This will be our only attempt to resolve these issues amicably. While it was disappointing to part ways, we agree that it is in the best interest of the Movement's mission and security in light of the unlawful activities that have continued to come to our attention. Once our requests for these conditions are met, MSTM will consider your resignation an amicable one.

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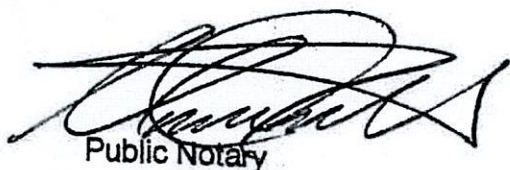
On behalf of the Military Sexual Trauma Movement,



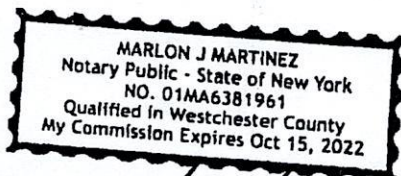
Janelle Marina Mendez  
Founder & CEO  
Military Sexual Trauma Movement

Westchester County  
State of New York

On this day of the 19th September 2019 in the county of Westchester in the State of New York, Janelle Marina Mendez appeared before me fully identified.



Public Notary



09/19/19

Enclosure:

Witness Statement, Pamela Heal  
Witness Statement, Kelsey Harbor